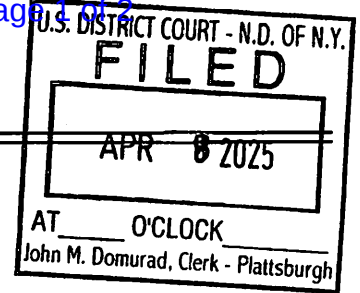


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

HASSAN MOHAMED,

Defendant.

Case No. 8:25-MJ-104 (GLF)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of April 7, 2025 in the county of Franklin in the Northern District of New York the defendant violated:

Code Section
8 U.S.C. § 1326(a) & (b)(2)

Offense Description
HASSAN MOHAMED, an alien, native and citizen of Somalia, being an alien who has been denied admission, excluded, deported, or removed, or has departed the United States while an order of exclusion, deportation, or removal is outstanding, entered and was thereafter found in the United States without the Attorney General of the United States, or his successor, the Secretary of Homeland Security, having expressly consented to his reapplication for admission into the United States and his removal was subsequent to a conviction for commission of an aggravated felony.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

D. Matthews 4/7/2025 - 2:00 PM

Complainant's signature

U.S. Border Patrol Agent Dustin Matthews

Printed name and title

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: APRIL 8, 2025

Gary L. Favro

Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, United States v. MOHAMED, Hassan.

This criminal complaint is based on the following facts:

On April 7, 2025, at approximately 1:09 AM, Burke Border Patrol Agents were informed via Swanton Sector Radio dispatch, of a border security camera image with a single subject walking southbound on Mary Riley Road in Westville, New York. At about 1:14 AM, Swanton Sector Radio dispatch notified Burke Border Patrol agents that the landowner of a farm located on Route 37, Fort Covington, New York, had confronted a subject that broke into his barn. A Supervisory Border Patrol Agent arrived on scene at about 1:18 AM and immediately addressed a subject who was stripped down to just his underwear and raising his voice at the landowner.

Border Patrol Agents conducted immigration questioning with the subject, later identified as MOHAMED, Hassan Ur, and discovered that the subject was born in Somalia. MOHAMED also claimed that he was a United States citizen. Border Patrol Agents asked MOHAMED if he had any identification or paperwork to which he replied that it was in his coat pocket which was lost when he fell into the river. Border Patrol Agents noted that MOHAMED appeared to match the description of the subject who was previously identified on a border security camera. At approximately 1:22 AM, additional Border Patrol Agents arrived on scene. MOHAMED was detained and transported to the Burke Border Patrol Station for record checks, interviews and processing.

After arriving to the station, record checks revealed that MOHAMED was not a United States citizen and had no legal right be in, pass through or remain in the United States. Record checks revealed that MOHAMED was ordered removed on December 3, 2009, by immigration judge and departed the United States to Canada on March 16, 2017, while the order of removal was still outstanding. Record checks further revealed that on November 8, 2007, MOHAMED was convicted of an armed bank robbery, and he was sentenced to ninety-three months in federal prison.

MOHAMED did not obtain the express consent of the Attorney General of the United States, or his successor, the Secretary of Homeland Security, to reapply for admission to the United States.